



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

SEEMA KASSAB
Assistant Corporation Counsel
phone: (212) 356-0827
fax: (212) 356-3509
skassab@law.nyc.gov

April 11, 2023

VIA ECF

Honorable Cheryl L. Pollak
United States Chief Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Carlton Roman v. City of New York, et al.
22-cv-6681 (NGG) (CLP)

Your Honor:

I represent defendants City of New York, John Loguercio, William Pepey, Gerard Fiorenza, Leonard Palermo, Patrick O'Brian, Dennis Byrne, Catharine Lomuscio, Richard Schaeffer, Robert Masters, and Francesco Catarisano in the above-referenced matter. Defendants write to respectfully request an extension of one week to respond to Plaintiff's letter (ECF No. 35) from April 13, 2023 to April 20, 2023. Plaintiff's counsel, James Henning, does not consent to this request.

The reason for this request is that counsel for the defendants has a summary judgment motion due on Friday April 14, 2023 that has required a substantial amount of time and effort. Accordingly, the undersigned requires more time to fully respond to plaintiff's 14-page letter laying out the depositions that he seeks to pursue in this matter.

Defendants thanks the Court for its consideration herein.

Respectfully submitted,

/s/ Seema Kassab
Seema Kassab
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Via ECF
James Henning

Denise Dessel
Attorneys for Plaintiff